

## **EXHIBIT 7**

1  
2 UNITED STATES DISTRICT COURT  
3 EASTERN DISTRICT OF NEW YORK

4 - - - - -  
5 ADRIAN SCHOOLCRAFT,  
6 Plaintiff,  
7 -against- Index No.  
8 10CIV-6005 (RWS)

9 THE CITY OF NEW YORK, DEPUTY CHIEF  
10 MICHAEL MARINO, Tax Id. 873220,  
11 Individually and in his Official  
12 Capacity, ASSISTANT CHIEF PATROL  
13 BOROUGH BROOKLYN NORTH GERALD NELSON,  
14 Tax Id. 912370, Individually and in his  
15 Official Capacity, DEPUTY INSPECTOR  
16 STEVEN MAURIELLO, Tax Id. 895117,  
17 Individually and in his Official  
18 Capacity, CAPTAIN THEODORE LAUTERBORN,  
19 Tax Id. 897840, Individually and in his  
20 Official Capacity, LIEUTENANT JOSEPH  
21 GOFF, Tax Id. 894025, Individually and  
22 in his Official Capacity, stg. Frederick  
23 Sawyer, Shield No. 2576, Individually  
24 and in his Official Capacity, SERGEANT  
25 KURT DUNCAN, Shield No. 2483,  
Individually and in his Official  
Capacity, LIEUTENANT TIMOTHY CAUGHEY,  
Tax Id. 885374, Individually and in his  
Official Capacity, SERGEANT SHANTEL  
JAMES, Shield No. 3004, and P.O.'s "JOHN  
DOE" 1-50, Individually and in their  
Official Capacity (the name John Doe  
being fictitious, as the true names are  
presently unknown)(collectively referred  
to as "NYPD defendants"), JAMAICA  
HOSPITAL MEDICAL CENTER, DR. ISAK ISAKOV,  
Individually and in his Official  
Capacity, DR. LILIAN ALDANA-BERNIER,  
Individually and in her Official Capacity  
and JAMAICA HOSPITAL MEDICAL CENTER  
EMPLOYEES "JOHN DOE" # 1-50, Individually

(Continued)

1  
2 and in their Official Capacity (the name  
3 John Doe being fictitious, as the true  
4 names are presently unknown),

5  
6 Defendants.

- - - - -x

7 111 Broadway  
8 New York, New York  
9 February 11, 2014  
10 10:30 a.m.

11 VIDEOTAPED DEPOSITION of DR. LILIAN  
12 ALDANA-BERNIER, one of the Defendants in  
13 the above-entitled action, held at the  
14 above time and place, taken before  
15 Margaret Scully-Ayers, a Shorthand  
16 Reporter and Notary Public of the State  
17 of New York, pursuant to the Federal  
18 Rules of Civil Procedure.

19 \* \* \*

1 L. ALDANA-BERNIER

2 risk," can you quantify that for me at  
3 all what you mean by potential?

4 A. The patient comes in barricaded  
5 himself, acting bizarre. He was brought  
6 in from his house. It was a police  
7 officer who may have access to weapons,  
8 easy for him to have access to weapons.  
9 He is paranoid. I would think that maybe  
10 it would be safe if the patient will be  
11 admitted.

12 Q. So your thought he might be  
13 safe if he was admitted?

14 A. If he was admitted.

15 Q. That's what you were talking  
16 about when you say potential risk,  
17 correct?

18 A. All of the above that I told  
19 you.

20 Q. Can you quantify what you mean  
21 by potential risk as far as the  
22 likelihood of risk? This word  
23 "potential" that you have been using, can  
24 you quantify that for me?

25 A. When you say "quantify," what

1 L. ALDANA-BERNIER

2 do you mean?

3 Q. Sure.

4 Well, you used the word  
5 "potential." I would like to know what  
6 you mean by potential.

7 A. If you think of the navy yard  
8 disaster, was he an officer or army man?  
9 He was so quite, no one ever found out  
10 what was going on with him. So what  
11 happened then?

12 Or if you look at all of those  
13 -- the Range Rover. Who are all of these  
14 people that caused that? They are all  
15 police officers.

16 So if I think then I have to  
17 make sure that when I see a patient in  
18 the ER, I have to think in the future  
19 that there will be no disaster, there  
20 will be no destruction, or no one will  
21 get harmed when they were discharged from  
22 the ER.

23 Q. I was asking about what you  
24 meant by potential.

25 A. That's the potential.

1 L. ALDANA-BERNIER

2 Q. So if there is any potential at  
3 all, you want to make sure that the  
4 patient is safe, correct?

5 A. Correct.

6 Q. And if there is any potential  
7 at all, you want to make sure the  
8 community is safe, correct?

9 A. That's correct.

10 Q. And if there is any potential  
11 at all, you were going to admit Mr.  
12 Schoolcraft, correct?

13 MR. LEE: Objection to form.

14 A. With all of those reasons, yes,  
15 I would have to admit him.

16 Q. When you admitted him to the  
17 emergency room, there were certain rules  
18 and regulations --

19 MR. SUCKLE: Withdrawn.

20 Q. When he was admitted to the  
21 psych floor, there were certain rules and  
22 regulations in the psych ward, correct,  
23 about clothes they wear, what hours  
24 visitors can come, correct?

25 A. Yes.